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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KOICHI TANIGUCHI,)	CIVIL ACTION NO. 08-0008
)	
Plaintiff,)	
)	
vs.)	PLAINTIFF'S INITIAL
)	DISCLOSURE
KAN PACIFIC SAIPAN, LTD.,)	
dba Mariana Resort and Spa,)	
)	
Defendant.)	

Comes now Kouichi Taniguchi, plaintiff herein, pursuant to Rule 26(a)
F.R.C.P. and LR 16.2CJ d, files this, his Initial Disclosure:

1. Persons Likely To Have Discoverable Information.

- a. Kouichi Taniguchi - circumstances of the injury, treatment, damages.
- b. Hisato Endo - circumstances of the injury, damages.
- c. Jun Kitaoka - circumstances of the injury.
- d. Mamoru Watanabe - circumstances of the injury. Manager, Mariana
Resort and Spa.
- e. Hajime Suzuki - circumstances of the injury.
- f. Chifuyu Arai, MD - diagnosis, prognosis, treatment of plaintiff's injury.
Park Hospital, 1086 Sendano, Shiraoka, Saitama, Japan.

2. Documents Plaintiff May Use To Support His Claims.

- a. Contracts between plaintiff and (1) Kyowa Lead Co., (2) Kyowa

Tatemono Corp., and (3) Eight Grape Corp

b. Termination of contract with Kyowa Lead Co.

c. Service requests for plaintiff submitted to Kyowa Lead Co.

d. Medical reports.

e. Advertising materials for Kyowa Tatemono Corp., showing athletes employed by the company.

All items above are in plaintiff's possession, and items in 2. a., b., c and d. have been provided to counsel for defendant.

3. Calculation of Damages.

Other than pain and suffering, current damage calculations shall be based upon the contracts set forth in 2.a, above. Plaintiff was unable to perform in accordance with the contracts due to the injury. The documents have been provided to defendant.

4. Insurance.

Plaintiff is informed that defendant does have insurance coverage for the type of injury complained of, but has not seen an insurance policy.

Dated this 14th day of March, 2008.

DOUGLAS F. CUSHNIE
Attorney for Plaintiff

/s/
DOUGLAS F. CUSHNIE